



Epstein Drangel LLP  
60 East 42nd Street, Suite 2520, New York, NY 10165  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

February 14, 2022

**VIA ECF**

Hon. P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Mattel, Inc. v. Betterlover, et al.*, Case No. 18-cv-11644 ("Case I")  
*Mattel, Inc. v. 2013CheapBuy, et al.*, Case No. 18-cv-11647 ("Case II")  
*Mattel, Inc. v. 2012shiningroom2012, et al.*, Case No. 18-cv-11648 ("Case III")  
Letter Requesting to File Motion for Default Judgment

Dear Judge Castel,

We represent Plaintiff Mattel, Inc. ("Plaintiff") in the above-referenced related actions.<sup>1</sup> On February 11, 2022, the Court entered an order, *inter alia*, directing the parties to appear for a Final Pre-Trial Conference on April 12, 2022. ("February 11, 2022 Order"). To date, however, none of the Defendants remaining in any of the above referenced actions have filed Answers or otherwise appeared in this Action, other than Defendant buybeautyproducts, who has failed to retain counsel in accordance with the Court's June 8, 2020 Order. (Case I, Dkt. 143). Plaintiff has not received any indication that any of the Defendants in the above actions intend to appear. Accordingly, all of the Defendants remaining in Case I, Case II and Case III are currently in default, and Plaintiff respectfully requests to file motions for default judgment in each of the actions by no later than April 12, 2022.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY 4228)  
dfutterman@ipcounselors.com  
60 East 42nd Street, Suite 2520

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Complaints or Applications.

Plaintiff shall  
move for a default  
judgment against the  
remaining defendants  
in the three actions  
as the actions  
will be dismissed  
for failure to  
appear.  
SO ORDERED  
USDC  
2-15-22

Noted  
in all  
3 cases

Hon. P. Kevin Castel  
February 14, 2022  
Page 2

New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiff*  
*Mattel, Inc.*